The Law Office of
Elizabeth E. Macedonio

80 Broad Street • Suite 1900 • New York • New York • 10004
Office: 212-257-6410 • *Fax:* 212-257-6453 • *Email:* emacedonio@yahoo.com

December 11, 2014

Via ECF

Honorable Allyne R. Ross
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Vincent Asaro
14 Cr. 26 (ARR)

Dear Judge Ross:

I write on behalf of defendant Vincent Asaro to object to the government's proposed protective order for the 3500 material in this case. (ECF #155-1) Specifically, the defendant objects to the following language which is found in paragraph three of the government's proposed order:

> The defendant is prohibited from taking Section 3500 Material, or copies thereof, into any jail facility, or possessing such material or copies in any such facility, except when reviewing the materials in the presence of his defense counsel or staff assisting defense counsel.

The large majority of the 3500 material in this case will come from government cooperators who have been cooperating with the government for a decade and who have testified in numerous proceedings. The documentation from these proceedings will consume thousands upon thousands of pages. Moreover, this material has been disseminated on multiple occasions in the past with no harm to the cooperators or their families. Accordingly, unless the government can make a further showing that this additional restriction is required, this language should be stricken from the proposed protective order.

There is no objection to the remainder of the proposed protective order.

Respectfully submitted,

Elizabeth E. Macedonio

Elizabeth E. Macedonio
Counsel for the Defendant
Vincent Asaro